

1
2
3
4
5
6
7 Magistrate Judge Paula L. McCandlis
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

CERTIFIED TRUE COPY
ATTEST: RAVI SUBRAMANIAN
Clerk, U.S. District Court
Western District of Washington
By _____ Deputy Clerk



UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff
v.
SHAWN MANSBERRY,
Defendant.

CASE NO. MJ23-098

COMPLAINT for VIOLATION

Title 18, U.S.C., Section 1709

BEFORE, Paula L. McCandlis, United States Magistrate Judge, U. S. Courthouse,
Seattle, Washington.

The undersigned complainant being duly sworn states:

COUNT ONE

(Theft of Mail by Postal Employee)

Beginning at a time unknown, but within the last five years, and continuing until
on or around March 10, 2022, in Snohomish County, within the Western District of
Washington, and elsewhere, SHAWN MANSBERRY, a United States Postal Service

1 employee, did embezzle and steal letters, mail, and any articles and things contained
2 therein which had come into the defendant's possession intended to be conveyed by mail.

3 All in violation of Title 18, United States Code, Section 1709.

4 And the complainant states that this Complaint is based on the following
5 information:

6 I, Alan G. Hancock, being first duly sworn on oath, depose and say:

7 1. I am a Special Agent with the United States Postal Service, Office of
8 Inspector General ("USPS OIG"). I have been a Special Agent with the USPS OIG since
9 May of 2005. Prior to becoming a Special Agent, I was a Postal Inspector for
10 approximately two years. I am currently assigned to the Seattle Field Office, which is
11 part of the Western Pacific Area Division of the Office of Inspector General. I am
12 authorized to enforce the laws of the United States regarding mail and to investigate
13 major crimes committed against the United States Postal Service ("USPS"). I have been
14 trained and have experience in criminal investigations pertaining to violations of Title 18,
15 United States Code, Chapter 83, relating to postal service crimes, and have conducted
16 several investigations relating to postal service crimes.

17 2. The information contained in this affidavit is based upon knowledge I
18 gained from my investigation, my personal observations (including my examination and
19 review of physical evidence obtained during the investigation), my training and
20 experience, and investigation by and conversations with other law enforcement officers
21 and postal management officials. Because this affidavit is submitted for the limited
22 purpose of establishing probable cause, it does not set forth every fact that I, or others,
23 have learned during the course of this investigation. As a result of this investigation, I
24 believe that SHAWN MANSBERRY committed the crime *Theft of Mail by Postal*
25 *Employee*, in violation of 18 U.S.C. § 1709.

26 3. SHAWN MANSBERRY was a City Letter Carrier at the Lynnwood Post
27 Office in Lynnwood, Washington. The Lynnwood Post Office is responsible for

1 delivering mail that is addressed to locations within the ZIP codes 98036, 98037, 98043,
2 and 98087. I determined through a review of postal records that MANSBERRY had
3 been employed with the U.S. Postal Service since May 26, 2018. MANSBERRY's
4 duties as a City Letter Carrier included: (i) delivering and collecting mail on foot or by
5 vehicle under varying road and weather conditions in a prescribed area; (ii) maintaining
6 professional and effective public relations with customers and others; (iii) having a
7 general familiarity with postal laws, regulations, products, and geography of the area; (iv)
8 protecting all mail, money, and equipment entrusted to his care; (v) returning all mail,
9 money, and equipment to the post office at the end of the workday; and (vi) not placing
10 mail in his pockets or clothing, lockers or desks, or in parcels, hand grips, lunch
11 containers, or other luggage.

12 4. This investigation was instigated following a complaint received on or
13 around July 16, 2021 from USPS customer R.L., who mailed a colored greeting card in
14 June of 2021 containing four Amazon gift cards worth \$200.00. According to R.L.: (i)
15 the greeting card was mailed to an address with the ZIP code 98043 but did not arrive at
16 its intended destination; and (ii) Amazon confirmed with R.L. that the gift cards were
17 redeemed on June 12, 2021.

18 5. I sent a subpoena to Amazon requesting the Amazon account information
19 for the person(s) who redeemed the gift cards that R.L. sent. On or around September 13,
20 2021, Amazon responded that an account under MANSBERRY's name had redeemed
21 those gift cards.

22 6. I then searched postal records and determined that MANSBERRY was
23 assigned to deliver mail on City Route 61, which is located in Lynnwood, WA 98087 and
24 consists of residential houses and apartments that mainly have locked Centralized Box
25 Units for mail delivery. MANSBERRY also assisted with the delivery of mail in other
26 ZIP codes covered by the Lynnwood Post Office as needed.

1 7. In December of 2021, I also received a complaint from USPS customer
2 M.K. regarding missing greeting cards that were mailed to her home address and which
3 contained cash, checks, and gift cards. I determined that M.K. lived within the delivery
4 area of City Route 61 (i.e., the same route to which MANSBERRY was assigned to
5 deliver mail).

6 8. In December of 2021, I mailed test greeting cards containing Target and
7 Walmart gift cards to M.K.'s home address in Lynnwood. I spoke with M.K. and
8 confirmed that she did not receive any of these test greeting cards. I also determined that
9 the gift cards inside of the test greeting cards had been redeemed. Thereafter, I obtained
10 video surveillance footage from Target and Walmart, which revealed that an individual
11 bearing MANSBERRY's image and likeness (as compared to his Washington driver's
12 license photograph and to covert video surveillance of MANSBERRY's workplace
13 activities) redeemed all the gift cards inside of the test greeting cards on December 15,
14 2021; December 24, 2021; and December 27, 2021.

15 9. On January 31, 2022, a covert camera was installed inside of
16 MANSBERRY's postal delivery vehicle. A review of the resulting footage showed that,
17 on almost a daily basis from February 1, 2022 to March 10, 2022, MANSBERRY opened
18 outgoing and incoming greeting cards and concealed this same mail on his person or in
19 his dark colored backpack.

20 10. On March 10, 2022, following the execution of a search warrant on
21 MANSBERRY's person and backpack, agents seized 31 mail items not addressed to
22 MANSBERRY and 6 parcel locker keys that MANSBERRY was not authorized to have
23 in his personal possession. During an interview later that day, MANSBERRY admitted
24 to agents that he stole mail due to his gambling issues.

25 11. Further investigation revealed that MANSBERRY obtained gift cards, cash,
26 and other items of a total value of \$742.75 as proceeds of this offense. MANSBERRY
27

1 further caused victims to incur \$120.00 in fees to stop payments on checks that were
2 mailed.

3 Based on the above facts, I respectfully submit that there is probable cause to
4 believe that SHAWN MANSBERRY committed the crime of *Theft of Mail by Postal*
5 *Employee*, in violation of Title 18, United States Code, Section 1709.

6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27


ALAN G. HANCOCK, Complainant
Special Agent, United States Postal
Service

Based on the Complaint and Affidavit sworn to before me, and subscribed in my presence, the Court hereby finds that there is probable cause to believe the Defendant committed the offense set forth in the Complaint.

Dated this 1st day of March, 2023.


PAULA L. MCCANDLIS
United States Magistrate Judge

UNITED STATES DISTRICT COURT
for the
Western District of Washington



United States of America

v.

)

Case No. MJ23-098

)

SHAWN MANSBERRY

)

)

)

*Defendant***ARREST WARRANT**

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay(name of person to be arrested) Shawn Mansberry,

who is accused of an offense or violation based on the following document filed with the court:

Indictment Superseding Indictment Information Superseding Information Complaint
 Probation Violation Petition Supervised Release Violation Petition Violation Notice Order of the Court

This offense is briefly described as follows:

Theft of Mail by Postal Employee, in violation of Title 18, United States Code, Section 1709.

Date: 03/01/2023

Issuing officer's signature

City and state: Seattle, WashingtonPaula L. McCandlis, United States Magistrate Judge

Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
 at (city and state) _____.

Date: _____

Arresting officer's signature

Printed name and title

This second page contains personal identifiers provided for law-enforcement use only and therefore should not be filed in court with the executed warrant unless under seal.

(Not for Public Disclosure)

Name of defendant/offender: Shawn Michael Mansberry

Known aliases: N/A

Last known residence: _____

Prior addresses to which defendant/offender may still have ties: _____

Last known employment: _____

Last known telephone numbers: _____

Place of birth: Pennsylvania

Date of birth: 12/08/1988

Social Security number: 167-70-7050

Height: 5'08"

Weight: 220

Sex: M

Race: W

Hair: BLK

Eyes: HAZ

Scars, tattoos, other distinguishing marks: _____

History of violence, weapons, drug use: _____

Known family, friends, and other associates (name, relation, address, phone number): _____

FBI number: 414151WC9

Complete description of auto: _____

Investigative agency and address: USPS-OIG, Seattle

Name and telephone numbers (office and cell) of pretrial services or probation officer (if applicable): _____

Date of last contact with pretrial services or probation officer (if applicable): _____

OCDETF Case Yes No